

Nicole Lavallee (SBN 165755)
Daniel E. Barenbaum (SBN 209261)
Jeffrey V. Rocha (SBN 304852)
BERMAN TABACCO
425 California Street, Suite 2300
San Francisco, CA 94104
Telephone: (415) 433-3200
Facsimile: (415) 433-6382
Email: nlavallee@bermantabacco.com
dbarenbaum@bermantabacco.com
jrocha@bermantabacco.com

*Attorneys for Lead Plaintiff Alameda County
Employees' Retirement Association and Lead
Counsel for the Class*

[Additional Counsel on Signature Page]

**UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
SAN FRANCISCO DIVISION**

PAUL HAYDEN, et al.,

Plaintiffs,

v.

PORTOLA PHARMACEUTICALS, INC.,
et al.,

Defendants.

Lead Case No. 3:20-cv-00367-VC

Consolidated Case Nos.
3:20-cv-00949-VC
3:20-cv-01501-VC

CLASS ACTION

**STIPULATION AND ~~PROPOSED~~
ORDER TO EXCEED PAGE LIMITS
FOR LEAD PLAINTIFF'S MOTION
FOR PRELIMINARY APPROVAL OF
PROPOSED CLASS ACTION
SETTLEMENT**

Dept.: 4 – 17th Floor
Judge: Hon. Vince Chhabria

WHEREAS, on June 9, 2022, Lead Plaintiff Alameda County Employees' Retirement System ("Lead Plaintiff") and Defendants¹ (collectively, the "Parties") agreed on material terms of a settlement of the above-captioned action, executed a binding term sheet/agreement, and filed a Stipulation and [Proposed] Order Vacating Hearing on Class Certification and Further Deadlines Due to Settlement (ECF No. 219);

WHEREAS, on June 14, 2022, the Court granted the Parties' Stipulation to Vacate Class Certification Hearing and Further Deadlines Due to Settlement (ECF No. 224) ("June 14, 2022 Order") and set Monday, August 8, 2022 as the deadline for Lead Plaintiff to file its Motion for Preliminary Approval of Proposed Class Action Settlement ("Motion for Preliminary Approval");

WHEREAS, Lead Plaintiff has been preparing its Motion for Preliminary Approval pursuant to paragraphs 55 and 57 of the Court's Standing Order for Civil Cases Before Judge Vince Chhabria ("Court's Standing Order");

WHEREAS, paragraph 57 of the Court's Standing Order instructs parties to make a request to extend Civil L.R. 7-4(b)'s 25-page limit for motions for preliminary approval if they believe they need more space to meet the rigorous level of scrutiny required under paragraph 57 (and states that "The Court will likely grant such a request for this kind of motion...."); and

WHEREAS, Lead Plaintiff represents that it requires more space in its Motion for Preliminary Approval to adequately explain the basis for the settlement pursuant to paragraph 57 of the Court's Standing Order.

NOW, THEREFORE, IT IS HEREBY STIPULATED AND AGREED, by and between Lead Plaintiff and Defendants, as follows:

PURSUANT TO STIPULATION, the page limit imposed by Civil L.R. 7-4(b) with respect to Lead Plaintiff's Motion for Preliminary Approval is extended to 45 pages.

¹ "Defendants" are, collectively, Portola Pharmaceuticals Inc. ("Portola"), Scott Garland, Mardi Dier, Sheldon Koenig, Hollings C. Renton, Jeffrey W. Bird, Laura Brege, Dennis Fenton, John H. Johnson, David C. Stump, H. Ward Wolff, Goldman Sachs & Co. LLC, Citigroup Global Markets Inc., Cowen and Company, LLC, William Blair & Company, L.L.C., and Oppenheimer & Co. Inc.

DATED: July 29, 2022

BERMAN TABACCO

/s/ Daniel E. Barenbaum

NICOLE LAVALLEE
DANIEL E. BARENBAUM
PATRICK T. EGAN
JEFFREY V. ROCHA

*Attorneys for Lead Plaintiff Alameda County
Employees' Retirement Association and Lead
Counsel for the Class*

DATED: July 29, 2022

**PAUL, WEISS, RIFKIND, WHARTON &
GARRISON LLP**

/s/ Joshua Hill

DANIEL J. KRAMER (*admitted pro hac vice*)
AUDRA J. SOLOWAY (*admitted pro hac vice*)
JOSHUA HILL (SBN 250842)
SHANE D. AVIDAN (*admitted pro hac vice*)

DATED: July 29, 2022

CONRAD | METLITZKY | KANE LLP

/s/ Mark R. Conrad

MARK R. CONRAD

*Attorneys for Portola Pharmaceuticals, Inc.,
Director and Officer Defendants*

DATED: July 29, 2022

MORRISON FOERSTER LLP

/s/ James J. Beha II

ANNA ERICKSON WHITE
JAMES J. BEHA II (*admitted pro hac vice*)
DAVID J. WIENER

Attorneys for Underwriter Defendants

E-Filing Attestation

I, Daniel E. Barenbaum, am the ECF User whose ID and password are being used to file this document. In compliance with Civil Local Rule 5-1(h)(3), I hereby attest that all parties above have concurred in and authorized this filing.

DATED: July 29, 2022

/s/ Daniel E. Barenbaum

~~[PROPOSED]~~ ORDER

PURSUANT TO STIPULATION, the page limit imposed by Civil L.R. 7-4(b) with respect to Lead Plaintiff's Motion for Preliminary Approval is extended to 45 pages.

IT IS SO ORDERED.

Dated: August 3, 2022



HONORABLE VINCE CHHABRIA
UNITED STATES DISTRICT JUDGE